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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 JAMES KU,

13 Plaintiff,

14 vs.

15
16 TRANS UNION, LLC, A DELAWARE
LIMITED LIABILITY COMPANY,
17 EQUIFAX INFORMATION SERVICES,
LLC, A GEORGIA LIMITED LIABILITY
18 COMPANY, AMERICAN EXPRESS
COMPANY, A NEW YORK COMPANY,
19 BANK OF AMERICA, N.A., A NATIONAL
BANKING ASSOCIATION, BMW
20 FINANCIAL SERVICES NA, LLC, A
21 DELAWARE LIMITED LIABILITY
COMPANY, U.S. DEPARTMENT OF
22 AGRICULTURE, A GOVERNMENT
23 AGENCY, AND CAPITAL ONE BANK
(USA), N.A., A FOREIGN CORPORATION,

24 Defendants.
25

CASE NO. 2:18-cv-01714-JCM-PAL

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANT BANK OF AMERICA,
N.A. TO RESPOND TO COMPLAINT**

[FIRST REQUEST]

Complaint Filed: September 7, 2018

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27 Plaintiff James Ku ("Plaintiff") and Defendant Bank of America, N.A. ("BANA") (collectively,
28 the "Parties"), by and through their undersigned counsel of record, hereby stipulate and agree to extend

1 the deadline for BANA to respond to Plaintiff's Complaint filed and served on September 7, 2018 and
2 November 27, 2018 respectively, as follows:

3 WHEREAS, the current deadline for BANA to file its response to Plaintiff's Complaint is
4 December 18, 2018, and it needs additional time to investigate Plaintiff's claims and prepare its response.

5 WHEREAS, the Parties conferred and reached an agreement to extend the deadline for BANA
6 to file a response to Plaintiff's Complaint up to and including January 17, 2019. This is the Parties' first
7 request for an extension of time on the response deadline.

8 THEREFORE, in consideration of the foregoing, the parties request that the Court modify
9 BANA's response deadline, as follows:

10 1. That the deadline for BANA to file a response to Plaintiff's Complaint is extended up to
11 and including January 17, 2019.

12
13 DATED this 13th day of December, 2018

DATED this 13th day of December, 2018

14 **MARX LAW FIRM**

AKERMAN LLP

15 By: /s/ Bradley M. Marx

By: /s/ Rex D. Garner

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19 *Attorneys For Plaintiff*

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America, N.A.*

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22 **IT IS SO ORDERED:**

23 
24 UNITED STATES MAGISTRATE JUDGE

25 Dated: December 17, 2018